

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION

| | | |
|---------------------------|---|------------------------------|
| MIKELA JACKSON, and |) | |
| JEAN KELLY, |) | Cause No.: 1:22-cv-00110-AGF |
| |) | |
| Plaintiffs, |) | |
| |) | |
| vs. |) | |
| |) | |
| CITY OF SIKESTON, et al., |) | |
| |) | |
| Defendants. |) | |

JOINT PROPOSED SCHEDULING PLAN

Meeting

Pursuant to Fed. R. Civ. P. 26(f), a meeting was held by telephone on October 11, 2022, Melissa Donlon for plaintiffs and Paul Knobbe for defendants. The results of the meeting were as follows:

- (a) Track Assignment. The parties agree that the case should be assigned to the Track 2: Standard Track with disposition within 18 months of filing and 180-240 days from Rule 16 Conference for discovery/dispositive motions.
- (b) Any motions to join additional parties and/or to amend the pleadings shall be filed by January 31, 2023.
- (c) The parties agree upon the following provisions in their discovery plan:
 - (i) provisions for disclosure or discovery of electronically stored information --- the parties believe that there is no electronically stored information involved in this case,
 - (ii) any agreements the parties reach for asserting claims of privilege or of protection as trial-preparation material after production --- the parties agree to meet and confer regarding any difficulties that are ever encountered in this regard,

- (iii) the date of October 25, 2022 by which the parties will disclose information and exchange documents pursuant to Fed. R. Civ. P. 26(a)(1),
 - (iv) the parties are in agreement that discovery should not be conducted in phases or limited to certain issues,
 - (v)
 - Plaintiff shall disclose their expert witnesses' identities and reports on March 22, 2023 and shall furthermore make their expert witnesses available for deposition by April 21, 2023.
 - Defendant shall disclose their expert witnesses' identities and reports on May 22, 2023 and shall furthermore make their expert witnesses available for deposition by June 23, 2023.
 - Plaintiff shall disclose rebuttal witnesses, if any, by July 14, 2023 and shall furthermore make their expert witnesses available for deposition by July 28, 2023.
 - (vi) the parties are in agreement with the presumptive limits of ten (10) depositions per side as set forth in Fed. R. Civ. P. 30(a)(2)(A), and twenty-five (25) interrogatories per party as set forth in Fed. R. Civ. P. 33(a), should apply in this case, and if not, the reasons for the variance from the rules,
 - (vii) any physical or mental examinations of parties will be requested and completed pursuant to Fed. R. Civ. P. 35, by January 31, 2023,
 - (viii) all discovery shall be completed by July 31, 2023 (see applicable track range, Section (a) above),
- (d) The referral of the action to mediation or early neutral evaluation would be most productive on or after February 1, 2023;
- (e) Any motions to dismiss or motions for summary judgment shall be filed by September 1, 2023;
- (f) the earliest date by which this case should reasonably be expected to be ready for trial would be _____.
- (g) an estimate of the length of time expected to try the case to verdict would be two weeks (10 days); and
- (h) there are no other matters counsel deem appropriate for inclusion in the joint proposed scheduling plan.

/s/ Melissa K. Donlon

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